

1 CLARK COUNTY SCHOOL DISTRICT
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6
7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 LESLIE RICE,

10 Plaintiff,

11 v.

12 CLARK COUNTY SCHOOL DISTRICT,

13 Defendant.

CASE NO. 2:16-cv-01709-JCM-PAL

STIPULATION TO EXTEND TIME FOR
DEFENDANT TO RESPOND TO
PLAINTIFF'S MOTION TO RE-OPEN
DISCOVERY

(First Request)

14 COME NOW, the parties, by and through their attorneys of
15 record, and hereby stipulate and agree to allow Defendant up to and
16 including Wednesday, June 14, 2017, to respond to Plaintiff's Motion
17 to Re-Open Discovery (Docket No. 34) filed May 17, 2017. The
18 response is currently due May 31, 2017 and this is the first request
19 to extend time for the response.

20 On May 26th the parties filed a stipulation to extend the time
21 for Defendant's response from May 31st to June 9th. Docket No. 38.
22 At the time filing that stipulation, defense counsel forgot that the
23 District's legal office is moving on June 9th. Defense counsel must
24 have his office packed by the end of June 8th and the move,
25 including computers, is to take place on June 9th and through the
26 weekend. This request to extend the time to the following
27 Wednesday, June 14th, is to ensure with the office move of June 9th
28 that defense counsel will be able to complete the opposition. With
the filing of this stipulation, Docket No. 38 will be withdrawn.

1 The following is the basis for the extension request set forth in
2 the parties previous stipulation in addition to the office move
3 discussed above.

4 The dispositive motion deadline is June 9, 2017. Docket No.
5 31. In addition to the motion deadline in this matter and current
6 motions Plaintiff recently filed that require responses, defense
7 counsel also has had summary judgment motions due in two (2) other
8 federal cases and a response to an OSHA employee retaliation
9 complaint and has an employee dismissal arbitration scheduled for
10 June 6th. This request for additional time is being made in good
11 faith based upon defense counsel's schedule as noted herein (and May
12 29th is a holiday). Defendant will be filing a motion for summary
13 judgment and this request will have Defendant's response to the
14 pending motion due the same time as the motion deadline as the
15 parties are filing stipulations with regard to the motion deadline
16 and other pending Plaintiff's motion to amend complaint so all will
17 be due June 14th.

18 Therefore, for the foregoing reasons, it is respectfully
19 requested that the time for Defendant's response to Docket No. 34

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1 be extended up to and including June 14, 2017, given defense
2 counsel's schedule and office move scheduled for June 9th described
3 above.

4 DATED this 31st day of May, 2017.

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6 CLARK COUNTY SCHOOL DISTRICT
Office of the General Counsel

DICKINSON WRIGHT PLLC

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14 **IT IS SO ORDERED:**

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16 Date: June 2, 2017


U.S. MAGISTRATE JUDGE